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U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2016 AUG 23 PM 4:17

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UNITED STATES OF AMERICA, *et. al.*
ex rel., VERONICA GARCIA,

Plaintiffs,

v.

TRUNG MINH TANG, *et. al.*,

Defendants.

Civil Action No. 3:12-CV-2126-M

FILED IN SEALED CASE

UNITED STATES OF AMERICA'S NOTICE OF
INTERVENTION FOR PURPOSE OF SETTLEMENT

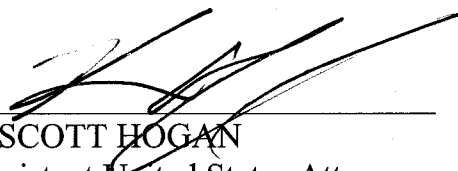
1. Pursuant to the False Claims Act, 31 U.S.C. §§ 3730(b)(2) and (4), the United States of America notifies the Court of its election to intervene in this civil action.
2. The United States, the State of Texas, the Relator, and the Defendants have reached a settlement in principle that, subject to approval by the authorized government officials, will resolve this civil action, except any claims with respect to the Relator's share of the settlement proceeds and Relator's claim for attorneys' fees. In order to permit the parties the necessary time to obtain the required approvals and to finalize and execute the terms of the settlement documents, the United States and the State of Texas respectfully request that the Court extend the seal for up to 90 days, to and including November 21, 2016, in order to allow the parties to finalize the settlement and file the necessary dismissal papers with the Court or, in the event the parties are not able to finalize the settlement, to permit the United States to file and serve its Complaint in Intervention in this matter.

3. Relator and Defendants, through their respective counsel, have authorized the undersigned to inform the Court that they join in the request for the extension of the seal for up to 90 days, to and including November 21, 2016, to allow the parties to finalize the settlement and file the necessary dismissal papers with the Court.
4. A proposed Order accompanies this notice.

Respectfully submitted,

BENJAMIN MIZER
PRINCIPAL ASSISTANT
ATTORNEY GENERAL

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UNITED STATES ATTORNEY



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CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2016, a copy of the foregoing pleading and proposed Order were mailed by first class mail to:

Mark Schlein
Baum Hedlund Aristei & Goldman, PC
12100 Wilshire Blvd., Suite 950
Los Angeles, California 90025


KENNETH G. COFFIN
Assistant United States Attorney

CERTIFICATE OF CONFERENCE

I hereby certify that on August 23, 2016, I discussed the request in the foregoing Notice that this matter remain under seal for 90 days with counsel for the Relator, Mark Schlein, as well as counsel for Defendants, Jeffrey Ainsley, James Jacks, and Robert Webster, and each stated that they, on behalf of their clients, join in the request for the extension of the seal for up to 90 days, to and including November 21, 2016, to allow the parties to finalize the settlement and file the necessary dismissal papers with the Court.


KENNETH G. COFFIN
Assistant United States Attorney